

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ALLSTATE INSURANCE COMPANY, et.al.,

Plaintiffs,

Civil Action No. 17-cv-13823

v.

Hon. Judith E. Levy

UTICA PHYSICAL THERAPY INC., et.al.,

Defendants.

**ATTORNEY CURTIS R. WILLNER'S MOTION & NOTICE TO
WITHDRAW FROM REPRESENTATION OF DEFENDANTS, STEFAN
GLOWACKI, M.D., AND STEFAN GLOWACKI, M.D.**

NOW COMES Attorney Curtis R. Willner, and hereby files his Motion and Notice to Withdraw from Representation of Defendants, Stefan Glowacki, M.D., and Stefan Glowacki, M.D., P.C. ("Defendants"), in the above-entitled matter pending in the Court.

In support of said Motion, Attorney Curtis R. Willner states that certain problems have arisen in the course of the representation, such that the Attorney-Client relationship between him and said Defendants has broken down to the point where he can no longer zealously represent them, and advance their defense. The undersigned states that good cause within the meaning of Michigan Rule of Professional Conduct 1.16(b) exists for such withdrawal of representation.

The undersigned Attorney for Defendants attests that:

- 1) He communicated the bases underlying this termination of representation to the client's agent, sufficiently in advance of the filing of this Motion to Withdraw; and

- 2) He discussed the pending Motion with Plaintiff's Attorney, Jacqueline A. McEttrick, Smith & Brink, P.C., and sought her concurrence, though complete concurrence was not given.

The factual, legal, and ethical bases supporting the undersigned's Motion to Withdraw may be adduced, more fully, upon inquiry by the Court, at a hearing on this Motion.

The undersigned respectfully requests that this Court:

- 1) Set a hearing on the Motion on the date of the Case Management Status and Scheduling Conference, 10:00 a.m., Monday, October 22, 2018, 200 E. Liberty Street, Suite 300, Ann Arbor, Michigan 48104; or at the Court's earliest possible opportunity, and
- 2) Grant his Motion to withdraw from representation of said Defendants.

Respectfully Submitted:

Curtis R. Willner P48010

Curtis R. Willner P48010
Attorney for Defendants
P. O. Box 182007
Shelby Township, MI 48318-2007
(586) 709-5906

DATED: October 12, 2018

PROPOSED ORDER FOLLOWS

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
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ALLSTATE INSURANCE COMPANY, et.al.,

Plaintiffs,

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v.

Hon. Judith E. Levy

UTICA PHYSICAL THERAPY INC., et.al.,

Defendants.

**ORDER ALLOWING ATTORNEY CURTIS R. WILLNER TO
WITHDRAW FROM REPRESENTING DEFENDANTS,
STEFAN GLOWACKI, M.D. & STEFAN GLOWACKI, M.D., P.C.**

This matter having come before the Court, upon the Motion of Attorney, Curtis R. Willner to Withdraw from representation of Defendants, Stefan Glowacki, M.D., and Stefan Glowacki, M.D., P.C. (“Defendants”), in the above-entitled matter, and following a hearing concerning the Motion before the Court on _____, the Motion is hereby GRANTED and IT IS HEREBY ORDERED that Attorney Curtis R. Willner may, and hereby does, withdraw as Attorney for Defendants, in the above-entitled matter;

IT IS FURTHER ORDERED:

- 1) Said Defendants shall have thirty (30) days to retain one or more other Attorneys to represent them in this matter, without prejudice to their defense;
- 2) During the period Defendants remain without representation, they, or their duly-authorized agent, shall provide this Court with an address, to be provided to all other Attorneys of record in this case, for service of any notices, correspondences or pleadings.

Dated this ____ day of October, 2018.

Hon. Judith E. Levy,
United States District Judge

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Defendants.

CERTIFICATE OF SERVICE

I, Curtis R. Willner, Attorney for Defendants, Stefan Glowacki, M.D., and Stefan Glowacki, M.D., P.C. ("Defendants"), hereby certify that I did serve the following Attorneys of record in the above-entitled matter with electronic copies of the foregoing Motion and Notice to Withdraw from Representation of said Defendants and Proposed Order regarding same, along with this Proof of Service, via the Court's CM/ECF system.

I further hereby certify that I did transmit via email, and first-class U.S. mail, a copy of said Motion and Order to the following:

Dorota Zielinski, Agent for Stefan Glowacki, M.D.
c/o Robert S. Popescu, Esq.
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Curtis R. Willner P8010

Curtis R. Willner, Attorney for Defendants